

Exhibit 36

DECLARATION OF JERRYDEAN SIMPSON and J.S.

I, Jerrydean Olivia Simpson, and on behalf of my son J.S., declare the following:

1. I am one of the Plaintiffs in this matter regarding the termination of DED. My minor son, J.S., is also a Plaintiff in this matter.
2. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.
3. I have been lawfully residing in the United States for over twenty years. I arrived in the United States in 1998 on a visitor's visa. When the U.S. government began issuing TPS, I applied for and was granted TPS status. When TPS was terminated for Liberia, I received DED. I am currently a DED recipient.
4. I am submitting this declaration to describe the harm J.S. and I have suffered since the announcement of the termination of DED for Liberians, and the harm my family, J.S., and I would suffer if DED is terminated.

Background

5. I was born in Monrovia, Liberia. I am 50 years old and I live in Clarksburg, Maryland.
6. In Liberia, I was working at a travel agency and made about 50 dollars a month. By the time I left Liberia, the war had already started and things were not good. My family was at risk because my father was working in the military under the president that was killed and overthrown by Charles Taylor, a convicted war lord and the former president.

7. I had the opportunity to visit family members in the U.S. in 1998, and could not return to Liberia because there was an uprising. Liberia was eligible for TPS so I was able to get TPS status. I was just trying to find a better life for myself.

8. After I arrived in the U.S., I started working for a temp agency, Man Power, after I got work authorization through DED in 1998. My job temps mostly consisted of filing documents.

9. I then started working for Federal Credit Union in Arlington in 1999. There, I was a member service representative.

10. Then around 2001, I started working for City Bank. I was there for about year and a half, and I started working as a bank teller and then became the assistant head teller.

11. I then started working at Navy Federal Credit Union in 2002. I started as a call center representative and then I worked as a member service representative and then a senior member service representative. I then became supervisor of the Rockville Branch in 2015. Then I became a senior member service representative at the Germantown Branch. This is the position I currently have. I am also a mortgage loan originator. I am committed to the bank and I have been recognized as an asset to the company. In 2012 I received the President's Award for Service Excellence.

12. Through my job, I participate in various community activities. I help my bank use allocated funds to purchase supplies for homeless shelters. Every year, I give information to members of the military about Navy Federal Credit Union during our annual military awareness event at Chick-Fil-A. For my next event, I will be visiting various high schools and talk to high school students about financial awareness.

13. In 2008, I obtained my daycare license through Montgomery County. I took some classes and then received a certification from the county for childcare. I renew my license every two years.

14. Around 2012, I started taking classes at University of Maryland, University of College. I have been taking classes periodically for a while because I have to pay for my classes myself; I am not eligible for financial aid because of DED. I am studying business administration so I can have my own business in the future. I am passionate about cooking and I like to cater for events on the side, and I would like to start my own restaurant one day. I am also interested in having a daycare center in the future and I could use my daycare license for the business.

Impact of Deferred Enforced Departure

15. I have benefited from DED in the sense that I am able to work to take care of my family. I have a nineteen year old daughter who is a college student, also known as Plaintiff Ami Sumareh, and a twelve year old son, also known as Plaintiff J.S. I am the only provider for my children.

16. I have been able to use my earnings to purchase a home and cars, and this has given my family stability. For me this place is home. The U.S. is all my kids have known.

17. I support my daughter with what she needs at her college campus and I assumed most of her loans for her.

18. Besides my children, I am able to send money to my family in Liberia. I send them money because the poverty level is high in Liberia and times are hard. My family relies on me and I try to help them up as much as possible.

19. I also really enjoy my job and that is why I have been there for almost seventeen years. I enjoy serving the military and their family members; I like helping them with their financial needs. Through my job, I also see the ins and outs of running a business and I would like to use this knowledge to start my own business. I hope that I am eligible for a business loan one day.

Impact of the Decision to Terminate DED

20. The upcoming end of the DED program has greatly affected my family and me. I have anxiety attacks most of the time and I have had many sleepless nights. It scares me knowing that I could have to return to Liberia and I do not know who would take care of my children. I am especially worried about my youngest, J.S., because I do not want to leave him but he does not want to go to Liberia.

21. I am very worried about being separated from my children because I am their sole provider. One time I experienced a delay with my work authorization and could not work for two and a half months. Being without a paycheck during that time was very difficult, and I cannot even imagine the hardship I would face while trying to take care of my family if I have to move to Liberia. I am worried about my economic prospects there; I have been told that it is difficult to find a job.

22. If DED ends, I will lose my job at Navy Credit Federal Union. My employer already sent me an urgent email notifying me that I will lose my job at the end of the month if I cannot get work authorization through DED. Attached as Exhibit A is a copy of the email I received.

23. I have been in the U.S. for over twenty years and I consider it my home. I have not been to Liberia since I moved here and my children have never been there. Liberia is

unknown to them. My children are suffering. J.S. is suffering the most and every day he is asking about DED and whether he will have to move to Liberia. When I had to renew my most recent work authorization, there was a delay and he got very worried. Every day he would go to the mailbox to check to see if I received my work authorization. J.S. has panic attacks from the stress. His teachers told me that he has problems focusing in class and when I asked him about it he said, "Mom how can I think about class when you may have to go?" He does not deserve to go through that.

24. I am concerned about my safety in Liberia. I heard so many stories about people who visited Liberia and never came back because the healthcare was so bad and they died because they couldn't get the proper care. I am worried about the same thing happening to me and my family. My mom is in Liberia and she is not doing well. She cannot get the proper healthcare so I send her medicine from the U.S.

25. I also heard that there is no running water there. People have to use wells to pump water. I don't know how my children can live in Liberia after being accustomed to life in the U.S.

26. I would also lose all of my assets that I developed here. I purchased my house in 2005 and I would lose it if I move back. I would also lose my car. Since I started working almost twenty years ago, I have been paying for Social Security and I will never see any of those benefits if I move back to Liberia.

27. I am also responsible for my daughter's college tuition loans. If I move back to Liberia, I have no idea how I would pay back those loans and I would receive a large debt. My daughter would also lose her ability to continue her college education.

28. I am hoping for the best and I am praying for at least an extension of the DED program.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4th day of March, 2019, in the District of Columbia.



Jerrydean Simpson

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: HRSC

To: [REDACTED]

[REDACTED]

Date: 02/27/2019 11:49 AM

Subject: URGENT: Work Authorization Renewal

Sent by: Veronica Lonsiak

Hello Jerrydean,

This e-mail is a reminder that your Eligibility for Employment will expire on **03/31/2019**. In order for you to maintain continuous employment with Navy Federal, you must provide a new work authorization before the current expiration date.

As you are aware, Federal law prohibits employers from continuing employment should updated documentation not be on file in a timely manner. Your immediate attention to this matter is greatly appreciated.

By law, we cannot employ anyone who cannot meet the I-9 requirements.

There are no grace periods or extensions that we will provide should your documentation expire. Legally, you will have to resign.

Individuals can get U.S. Citizenship and Immigration Services (USCIS) forms and information on immigration laws, regulations, and procedures by calling the USCIS National Customer Service Center toll-free at 1-800-375-5283.

Please provide our new documents to your management team.

Should you have any questions this please contact Veronica Lonsiak [REDACTED] or Leo Gonzalez [REDACTED] or feel free to email us.

What is TPS

The Secretary of Homeland Security may designate a foreign country for TPS due to conditions in the country that temporarily prevent the country's nationals from returning safely, or in certain circumstances, where the country is unable to handle the return of its nationals adequately. USCIS may grant TPS to eligible nationals of certain countries (or parts of countries), who are already in the United States. Eligible individuals without nationality who last resided in the designated country may also be granted TPS.

Please click on the link below to view a list of designated countries for Temporary Protected Status.

<https://www.uscis.gov/humanitarian/temporary-protected-status#Countries%20Currently%20Designated%20for%20TPS>

Management team,

The Tracker I-9 system has recently been upgraded. Please contact Veronica Lonsiak [REDACTED] or Leo Gonzalez [REDACTED] for assistance completing the Form I-9 Section 3.

Regards,

Veronica Lonsiak
Employee Service Center Representative
[REDACTED]

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